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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 In the Matter of the Search of
Express Line Corporation, 901 W.
13 Arbor Vitae St, Inglewood, CA,
14 90301

No. 22-MJ-03131

GOVERNMENT'S EX PARTE APPLICATION
FOR FIRST EXTENSION OF TIME WITHIN
WHICH TO RETAIN AND SEARCH DIGITAL
DEVICES; DECLARATION OF JAY WEIMER

(UNDER SEAL)

17 The United States of America, by and through its counsel of
18 record, Assistant United States Attorney Solomon Kim, hereby applies
19 for an order extending by 120 days the time within which the
20 government may retain and search the digital devices specified in the
21 application, which were seized pursuant to a federal search warrant.
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1 This application is based on the attached declaration of Jay
2 Weimer and the files and records of this case, including the
3 underlying search warrant and affidavit in support thereof.

4 Dated: December 5, 2022

Respectfully submitted,

5 E. MARTIN ESTRADA
6 United States Attorney

7 ANNAMARTINE SALICK
8 Assistant United States Attorney
9 Chief, National Security Division

10 /s/

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12 SOLOMON KIM
13 Assistant United States Attorney

14 Attorneys for Applicant
15 UNITED STATES OF AMERICA
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DECLARATION OF JAY WEIMER

I, Jay Weimer, hereby declare and state:

1. I am an Assistant United States Attorney assigned to this investigation for United States Attorney's Office for the Northern District of Texas.

2. This declaration is made in support of a request for an order permitting the government to retain and search, pursuant to the terms of the original warrant in this matter, for an additional 120 days, the following digital devices seized pursuant to the warrant described below (the "SUBJECT DIGITAL DEVICES"):

- a. Imaging from Dell Server Model E09S001, Service Tag: CD33G01
- b. Imaging from Dell Server Model E20S, Service Tag: DHN0DZ1
- c. Imaging from Dell Server Model E20S, Service Tag: DHP0DZ1
- d. Imaging from Dell Server Model E30S, Service Tag: JDN90M2
- e. Imaging from Western Digital Hard Drive, Part # WDBYNN0010BBK-0B
- f. Imaging from Dell Server Power Edge T130, Service Tag: B5GMCV2
- g. Imaging from Western Digital Network Storage Device Digital Model: MyCloud EX2
- h. Imaging from External USB Drive, Seagate 5TB, Model: SRD0NF1
- i. Imaging from Desktop, HP Envy, Model TE01-0175XT

- j. Imaging from Black iPhone in Blue Case, Serial:
DNPDVMS0D83
- k. Imaging from Verbatim Flashdrive, 32GB
- l. Imaging from Desk Laptop, Dell Latitude E745D, Service
Tag: 91RGN32
- m. Imaging from Laptop, LG Gram Model 14Z980]
- n. Imaging from Desktop, HP Envy Model 750-565se
- o. Imaging from Desktop, HP Envy Model 750-537cb
- p. Imaging from External USB Drive, Toshiba Model DTC
910, 1TB
- q. Imaging from laptop, Lenovo Thinkpad X1 Carbon
Clamshell Black
- r. Imaging from Dell Tower PC, D12M Tower, Black

3. On August 10, 2022, Special Agent David Bolton of the Office of Export Enforcement obtained a federal search warrant issued by the Honorable Steven Kim, United States Magistrate Judge, authorizing the search of Express Line Corporation, 901 W. Arbor Vitae St, Inglewood, CA, 90301 (the "SUBJECT PREMISES"). The warrant, which is incorporated herein by reference, authorized the seizure of digital devices from the SUBJECT PREMISES for a period of 120 days to allow the government to search such devices for evidence of violations of the Export Control Reform Act ("ECRA"), 50 U.S.C. § 4819, the Export Administration Regulations (EAR), 15 C.F.R. Parts 730-774, Title 18 U.S.C. § 371 (Conspiracy to Violate ECRA and the EAR), Title 13 U.S.C. § 305 (Submitting False or Misleading Export Information), and Title 18 U.S.C. § 554 (Smuggling Goods from the United States).

1 4. On August 17, 2022, federal agents executed the warrant and
2 seized the SUBJECT DIGITAL DEVICES.

3 5. This is the first request for an extension. The current
4 deadline by which the government must complete its review of the
5 SUBJECT DIGITAL DEVICES is December 15, 2022.

6 6. Based on information provided to me by agents assigned to
7 this matter, I understand that all digital devices seized during the
8 search warrant have been imaged and the physical devices have been
9 returned to the original owners. The forensic images are in the
10 possession of the respective forensic lab and are awaiting further
11 processing before the agents can review the images of the seized
12 digital devices to determine their evidentiary value.

13 7. For the following reasons, the government is requesting an
14 additional 120 days to complete its review of the SUBJECT DIGITAL
15 DEVICES:

16 a. The forensic review of digital devices is time
17 consuming. Agents cannot simply turn on computers and review their
18 contents because merely turning on a computer and reviewing its
19 contents changes the data on the computer. Specialized computer
20 software is therefore needed to ensure that evidence remains in a
21 pristine and usable condition and is not affected by the review
22 process. The review also must be conducted by agents who have
23 received specialized training to ensure that the review is done
24 thoroughly and in a forensically sound fashion. This process takes
25 substantial time.

26 b. The SUBJECT DIGITAL DEVICES contain approximately
27 30,930 gigabytes of information. Based on my training and
28 experience, I know that one gigabyte could hold the contents of about

1 ten yards of books on a shelf. One hundred gigabytes could hold an
2 entire library floor of academic journals.

3 c. Furthermore, the computer forensic laboratory
4 responsible for forensically processing the seized digital devices
5 have encountered various technical issues and manpower constraints
6 that delayed the case agents from obtaining access to the material.
7 The forensic images must also be processed/converted into a
8 specialized file format associated with a proprietary software before
9 the agents can begin their review digital evidence. The case agents
10 have consulted with the supporting forensic laboratory and expect to
11 receive access to the digital material to begin their review within
12 the next 14 days.

13 Accordingly, the government requests an additional 120 days to
14 retain and search the aforementioned digital material.

15 I declare under penalty of perjury under the laws of the United
16 States of America that the foregoing is true and correct.

17 DATED: December 5, 2022

18 /s/ Jay Weimer
19 JAY WEIMER
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